

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AARON ABADI,

Plaintiff,

v.

AMERICAN AIRLINES, INC., ET AL

Defendants.

CIVIL DIVISION

Civil Action No. 23-CV-4033 (LJL)

**NOTICE OF STAT-MD'S MOTION TO
DISMISS PLAINTIFF'S COMPLAINT**

Filed on behalf of Defendant:
Center for Emergency Medicine of Western
Pennsylvania d/b/a STAT-MD

Counsel of record for this party:

Beverly M. Barr, Esquire (BB2665)

Dickie, McCamey & Chilcote, P.C.
445 Hamilton Avenue
Suite 1102
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(914) 358-3290

JURY TRIAL DEMANDED

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AARON ABADI,

Plaintiff,

v.

AMERICAN AIRLINES, INC., ET AL

Defendants.,

Defendants.

Civil Action No. 23-CV-4033 (LJL)

Judge Lewis J. Liman

Electronically Filed

NOTICE OF STAT-MD'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT

PLEASE TAKE NOTICE that Defendant Center for Emergency Medicine of Western Pennsylvania d/b/a STAT-MD, by and through its attorneys, Dickie, McCamey & Chilcote, P.C., will and hereby do move this Honorable Court at the United States District Court for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, New York 10007, before the Honorable Lewis J. Liman, United States District Judge, on a date and time to be set by the Court, for an order dismissing Plaintiff's Complaint as against STAT-MD pursuant to Federal Rule of Civil Procedure 8, 12(b)(2), and 12(b)(6) for lack of personal jurisdiction and failure to state a claim upon which relief can be granted, and for any other relief deemed appropriate by the Court.


STAT-MD's Motion to Dismiss is based upon this Notice, and the attached Memorandum of Law in Support, filed concurrently herewith, the records, pleadings, and documents on file in this matter, and any such oral and/or documentary evidence as may be presented prior to, or at the time of, a hearing on this matter as scheduled by the Court. For the reasons detailed above and herein, STAT-MD's Motion to Dismiss should be granted in its entirety.

In compliance with Local Civil Rule 7.2 Authorities to Be Provided to Pro Se Litigants, STAT-MD will send a separate email to Plaintiff with copies of the unpublished cases cited in the accompanying Memorandum of Law in Support.

PLEASE TAKE FURTHER NOTICE that Plaintiffs will be required to respond pursuant to a briefing schedule to be set by the Court (or, in the absence of a specific order, by Local Rule 6.1(b)).

Dated: New York, New York
December 20, 2023

DICKIE, McCAMEY & CHILCOTE, P.C.



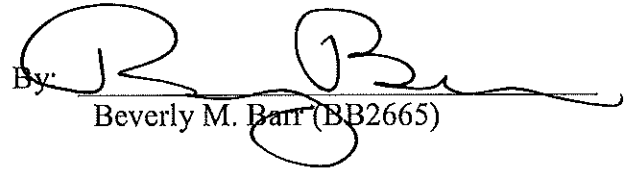
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Attorneys for Defendant:
Center for Emergency Medicine of Western
Pennsylvania, Inc., d/b/a STAT-MD

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December, 2023, I filed the foregoing Notice of STAT-MD's Motion to Dismiss Plaintiff's Complaint with the Clerk using the CM/ECF System, which will send notification of such filing to the registered participants as identified on the Notice of Electronic Filing, and, on this day, I will cause a copy to be mailed to each of those indicated as non-registered participants and mail a copy to Aaron Abadi, with a copy of all cited unpublished opinions, using the following address for Mr. Abadi: 82 Nassau Street, Apt. 140, New York, NY 10038

By: 
Beverly M. Barr (BB2665)